

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

SINGULAR COMPUTING LLC,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

Civil Action No. 1:19-cv-12551 FDS

Hon. F. Dennis Saylor IV

**DECLARATION OF VISHESH NARAYEN IN SUPPORT OF DEFENDANT
GOOGLE LLC’S MOTION FOR SUMMARY JUDGMENT OF NON-INFRINGEMENT**

I, Vishesh Narayen, upon my personal knowledge, hereby submit this declaration pursuant to 28 U.S.C. § 1746 and declare as follows:

1. I am an attorney at the law firm of Keker, Van Nest & Peters LLP. I represent Defendant Google LLC (“Google”) in the above-captioned case.

2. Attached hereto as **Exhibit 1** is a true and correct copy of the Expert Report of Sunil P. Khatri, PhD. regarding alleged infringement (“Khatri Report”), without accompanying exhibits, which Plaintiff Singular Computing LLC (“Singular”) served on December 22, 2022.

3. Attached hereto as **Exhibit 2** is a true and correct copy of the Rebuttal Expert Report of Martin Walker, Ph.D. regarding non-infringement (“Walker Report”), without the appendices or accompanying exhibits, which Google served on March 3, 2023.

4. On July 14, 2021, Singular deposed Google engineer Andrew Phelps. Attached hereto as **Exhibit 3** is a true and correct copy of the deposition transcript of Mr. Phelps (“Phelps Dep. Tr.”).

5. On March 23, 2023, Google deposed Singular's technical expert, Dr. Sunil Khatri, regarding his opinions and expert report on alleged infringement. Attached hereto as **Exhibit 4** is a true and correct copy of the March 23, 2023 deposition transcript of Dr. Khatri ("Khatri 3/23/23 Dep. Tr.").

6. Attached hereto as **Exhibit 5** is a true and correct copy of U.S. Patent No. 8,407,273 (the "'273 patent").

7. Attached hereto as **Exhibit 6** is a true and correct copy of U.S. Patent No. 9,218,156 (the "'156 patent").

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on April 27, 2023, in Tampa, Florida.


VISHESH NARAYEN

CERTIFICATE OF SERVICE

I certify that this document is being filed through the Court's electronic filing system, which serves counsel for other parties who are registered participants as identified on the Notice of Electronic Filing (NEF). Any counsel for other parties who are not registered participants are being served by first class mail on the date of electronic filing.

/s/ Nathan R. Speed
NATHAN R. SPEED